

**Motion for Relief Worksheet Instructions**

**PLEASE REVIEW THE INSTRUCTIONS BELOW PRIOR TO EXECUTING THE  
ATTACHED DOCUMENT.**

The information we have used to complete the worksheet comes from the referral documents. If there are any issues with this information or changes subsequent to the referral reflected in your records, please update the attached document or inform us and we will make the changes for your review and approval. The worksheet must be executed by the party with actual knowledge of the information provided based upon his or her review of your business records. Prior to signing, please review the following:

1. The attached document is a worksheet that is required by the Bankruptcy Court to be submitted in conjunction with the motion for relief that we have been requested to file on your behalf.
2. The document will be filed in Federal Court and must be signed under the pains and penalties of perjury.
3. Prior to signing, please review all of the statements contained in the attached document to make sure that they are complete and accurate and are supported by the information contained in your business records. Please make any required changes prior to signing.
4. Please make sure that you have reviewed any documents that are referenced and attached to the worksheet and verify that these documents are kept in your records. If any document that is referenced is missing, please do not execute the attached until you have obtained and reviewed the document that is referenced.
5. If you are authorized to sign on behalf of an entity, please make sure that your signature information, capacity and title are accurate.
6. This law office will sign the portion of the document which relates to the current liens.
7. The estimated legal fee and costs for completion of the motion for relief related to the attached worksheet is \_\_\_\_\_.

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS (BOSTON)

IN RE: Skapars, Yvonne V

Champion Mortgage Company, a division of  
Nationstar Mortgage LLC  
VS.  
Skapars, Yvonne V

CHAPTER 13  
CASE NO. 15-11221-WCH

**MOTION FOR RELIEF FROM STAY - REAL ESTATE WORKSHEET**

(To be attached to Motion for Relief from Stay)

I, Tiffany Dearmon of Champion Mortgage Company  
(hereinafter, "Movant") hereby declare (or certify, verify, or state):

**BACKGROUND INFORMATION**

1. (a) Date chapter 13 petition was filed (If case has been converted from Chapter 7 to Chapter 13, provide date of petition and date of conversion): 03/31/2015  
  
(b) Address of real property which is the subject of this motion: 122 Oakmont Road
2. (a) Original Mortgagee's Name and Address: MetLife Home Loans, a Division of MetLife Bank, N.A.  
  
(b) Name and Address of Current Mortgage Holder: Champion Mortgage Company c/o  
Champion Mortgage, P.O. Box 619093, Dallas, TX, 75261  
  
(c) Name of Note Holder, if different than Mortgage Holder: same as above
3. Date of Mortgage: 10/21/2011
4. Post-Petition payment address, if different than above: same as above
5. The manner in which the Movant perfected its interest in the property: Recorded Mortgage.
6. Other Collateral securing the note: N/A
7. Other liens and encumbrances affecting the property in the order of their priority:

Senior Liens: - Junior Liens:

Names of Senior Lien Holder	Amount Due	Source of Information (e.g., Schedules filed by Debtor(s), public records)
Movant's Lien	\$412,068.85	Estimated Payoff as of June 30, 2015
Names of Junior Lien Holders	Amount Due	Source of Information
Department of Housing and Urban Development	\$412,068.85	Registry of Deeds

8. Existence and Date of Recorded Homestead (if known): \_\_\_\_\_

**DEBT/VALUE REPRESENTATIONS**

9. Total pre-petition and post-petition indebtedness of Debtor(s) to Movant at the time of filing the motion: \$412,068.85

(Note: this amount may not be relied on as a "payoff" quotation.)

10. (a) Movant's estimated fair market value of the real property: \$440,000.00

(b) Source of estimated fair market valuation: Exterior Appraisal

(c) Liquidation value of the real property: \_\_\_\_\_.

**STATUS OF DEBT AS OF THE PETITION DATE**

11. (a) Total pre-petition indebtedness of Debtor(s) to Movant as of petition filing date:  
\$410,110.73

(b) Amount of principal: \$409,866.16

(c) Amount of interest: \$1,704.60

(d) Amount of escrow (taxes and insurance): \$0

(e) Amount of forced placed insurance expended by Movant: \$0

(f) Amount of Attorney's fees billed to Debtor(s) pre-petition: \$3,447.43

(g) Amount of pre-petition late fees, if any, billed to Debtor(s): \$0

12. Contractual interest rate: 5.060.((If interest is (or was) adjustable, please list the rate(s) and dates(s) the rate(s) was/were in effect on a separate sheet and attach the sheet as an exhibit to this form; please list the exhibit number here :)
13. Explain any additional pre-petition fees, charges or amounts charged to the account of the Debtor(s) and not listed above: \_\_\_\_\_.

**AMOUNT OF ALLEGED POST-PETITION DEFAULT  
(AS OF 07/24/2015 (MM/DD/YYYY))**

**See Form R**

14. Date last payment was received: (mm/dd/yyyy). N/A
15. Total number of post-petition payments due from the date of the filing of petition through the date of this Motion or (mm/dd/yyyy):\_\_\_\_\_.

**SCHEDULE OF POST-PETITION PAYMENTS IN DEFAULT  
(Do not substitute computer generated internal accountings):**

Payment Due Date	Amount of Payment Due	Amount of Payment Received	Date Payment Received	Amount Applied to Principal	Amount Applied to Interest	Amount Applied to Escrow	Late Fee Charged if any	Amount Not Applied
Totals	\$	\$	\$	\$	\$	\$	\$	\$

16. Amount of Movant's Attorneys' fees charged to Debtor to date for the preparation and filing of this Motion: \$1,025.00.
17. Other Attorneys' fees charged to Debtor post-petition: \$0\_\_\_\_\_.
18. Amount of Movant's post-petition inspection fees: \$0\_\_\_\_\_.

19. Amount of Movant's post-petition appraisal/broker's price opinion: \$0\_\_\_\_\_.
20. Amount of forced placed insurance or insurance provided by the Movant post-petition:  
\$0\_\_\_\_\_.
21. Sum held in suspense by Movant in connection with this contract, if applicable: \$ 0.00 .
22. Amount of other post-petition advances or charges (e.g. real estate taxes, insurance):  
\$1,204.15.
23. Total amount of post-petition default, including all payments, fees, and charges:  
\$3,565.81
24. Amount and date of post-petition payments offered by the Debtor(s) and refused by the  
Movant: Amount(s) \$0\_\_\_\_\_;  
Date(s): \_\_\_\_\_.

**REQUIRED ATTACHMENTS TO MOTION**

Attach the following documents to this motion and indicate the exhibit number associated with the documents:

- (1) Copies of documents that indicate Movant's interest in the subject property. For purposes of example only, a complete and legible copy of the promissory note or other debt instrument together with a complete and legible copy of the mortgage and any assignments in the chain from the original mortgagee to the current moving party.  
(Exhibits \_\_\_\_\_.)
- (2) Copies of documents establishing proof of standing to bring this motion if different from the above. (Exhibits \_\_\_\_\_.)
- (3) Copies of documents establishing that Movant's interest in the real property is perfected. For the purposes of example only, a complete and legible copy of the Financing Statement (UCC-1) filed with either the Clerk's Office or the Register of the county the property is located in. (Exhibits \_\_\_\_\_.)

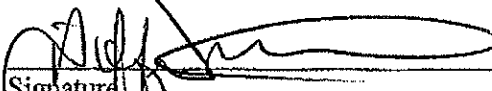
### CERTIFICATION AND DECLARATION FOR BUSINESS RECORDS

The undersigned certifies that the information provided in this worksheet and any exhibits attached to this worksheet (other than transactional documents attached as required in paragraphs (1) through (3) above) are derived from records that (a) were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by a person with knowledge of those matter; and (b) were prepared and kept in the regular course of business.

In the event the Worksheet is not fully completed, Movant shall explain the reasons therefore and the reasonable efforts made to obtain the information: \_\_\_\_\_

The undersigned further certifies that copies of any transactional documents attached to this worksheet is required by paragraphs 1, 2, or 3, immediately above, are true and accurate copies of the original documents. The undersigned further certifies that the original documents are in Movant's possession, except as follows: \_\_\_\_\_

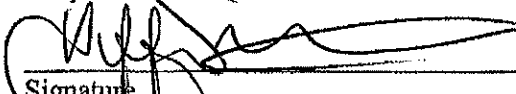
I/WE DECLARE UNDER THE PENALTY OF PERJURY THAT THE FOREGOING REPRESENTATIONS OF FACT ARE TRUE AND CORRECT TO THE BEST OF MY/OUR KNOWLEDGE AND BELIEF.

  
\_\_\_\_\_  
Signature  
Tiffany Dearmon  
\_\_\_\_\_  
Printed Name

7/30/15  
\_\_\_\_\_  
Date

Bankruptcy Specialist  
\_\_\_\_\_  
Title and Organization

Responses as to Questions 7 and 8

  
\_\_\_\_\_  
Signature  
Tiffany Dearmon  
\_\_\_\_\_  
Printed Name

7/30/15  
\_\_\_\_\_  
Date

Bankruptcy Specialist  
\_\_\_\_\_  
Title and Organization